

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Tamika Taylor	Chapter 13 Proceeding
Debtor(s) PENNYMAC LOAN SERVICES, LLC Movant	23-13162-amc
vs. Tamika Taylor	Hearing: 01/10/2024
and SCOTT F. WATERMAN [Chapter 13] Respondents	

OBJECTION TO CONFIRMATION OF THE PLAN

PENNYMAC LOAN SERVICES, LLC (Movant), a secured creditor in this case objects to the confirmation of the Debtor's Chapter 13 plan and states the following:

1. The plan does not provide for the secured creditor, PENNYMAC LOAN SERVICES, LLC to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on 10/22/2023, Movant is the holder of a secured claim in the amount of \$129,350.87 secured by the Debtors' property located at 6379 West Columbia Avenue, Philadelphia, PA 19151.
3. The plan materially underestimates the pre-petition arrears claim of Movant, which is due arrears in the approximate amount of **\$3,847.69**. A proof of claim will be filed prior to the deadline for filing claims.
4. Debtor's Plan proposes to pay Movant **\$1,711.00** in pre-petition arrears, which is insufficient to provide for Movant's arrearage claim. See **Exhibit "A"** attached hereto and made a part hereof.
5. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Karina Velter, Esquire

POWERS KIRN, LLC

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